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16  
17 **IN UNITED STATES DISTRICT COURT**  
18 **FOR THE DISTRICT OF NEVADA**

19 ROSA CARMINA CONTRERAS-BERNAL )  
20 )  
21 Plaintiff, )  
22 ) Case No.: 2:24-cv-2358-BNW  
23 v. )  
24 EQUIFAX INFORMATION SERVICES )  
25 LLC, )  
26 )  
27 Defendant. )  
28 )

29 **STIPULATION TO EXTEND THE DEADLINES OF THE MARCH 13, 2025,**  
30 **DISCOVERY PLAN AND SCHEDULING ORDER**

31 **(First Request)**

32 Plaintiff Rosa Carmina Contreras-Bernal (“Plaintiff”) and Defendant Equifax  
33 Information Services LLC ("Defendant") (collectively the “Parties”), by their respective  
34 counsel, stipulate to, and respectfully move the Court to, Extend the Deadlines of the March  
35 13, 2025, Discovery Plan and Scheduling Order by 60-days. In support of this stipulation,  
36 the Parties state as follows:

1           1.     Plaintiff filed the subject Complaint against Defendant alleging violations of  
2 the Fair Credit Reporting Act, 15 U.S.C. 1681 *et seq.*

3           2.     On March 13, 2025, this Court entered a Stipulated Discovery Plan and  
4 Scheduling order with the following Discovery Plan deadlines:

- 5               a. Initial Disclosures deadline: March 20, 2025
- 6               b. Amend pleadings and add parties deadline: June 4, 2025
- 7               c. Expert disclosures (initial) deadline: July 3, 2025
- 8               d. Expert disclosures (rebuttal) deadline: August 4, 2025
- 9               e. Discovery cutoff date deadline: September 2, 2025
- 10              f. Dispositive motions deadline: October 2, 2025
- 11              g. Pretrial order deadline: November 25, 2025

12           3.     The Parties have already served initial disclosures, exchanged written  
13 discovery responses, and produced documents. Plaintiff has retained an expert; however,  
14 the expert requires a review of additional documents to submit his report. The Parties have  
15 a conference to resolve discovery issues scheduled for June 30, 2025. Defendant Equifax  
16 has retained new outside counsel that filed an appearance on June 25, 2025, that will be  
17 taking the lead at the June 30, 2025, conference. The requested additional time will allow  
18 the Parties to resolve the current discovery issues in this matter.

19           4.     The Parties respectfully request this Court extend the remaining deadlines of  
20 the March 13, 2025, Discovery Plan and Scheduling Order as follows:

- 21               a. Expert witness disclosures pursuant to Fed. R. Civ. P 26(2)(B) deadline:  
22               September 3, 2025
- 23               b. Rebuttal expert disclosures and reports pursuant to Fed. R. Civ. P 26(2)(A)  
24               and 26(2)(B) deadline: October 3, 2025
- 25               c. Discovery cutoff date deadline: November 3, 2025
- 26               d. Dispositive motions deadline: January 6, 2026
- 27               e. Pretrial order deadline: January 23, 2026

28           5.     Counsel for the Parties have conferred in good-faith and stipulate to the above

1 proposed deadlines.

2 6. The Parties have not requested or received any previous extensions of the  
3 deadlines entered in the March 13, 2025, Discovery Plan and Scheduling Order and this  
4 requested extension is not for the purpose of delay.

5 7. The Parties hereby request a 60-day extension of the remaining deadlines in  
6 the March 13, 2025, Discovery Plan and Scheduling Order.

7 WHEREFORE, the Parties jointly request that the Court extend the remaining  
8 deadlines of the March 13, 2025, Scheduling Order by 60-days.

9  
10 Respectfully submitted,

11 /s/ James M. Smith  
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*Counsel for Equifax Information Services  
LLC*

IT IS SO ORDERED:

23   
24 UNITED STATES MAGISTRATE JUDGE

25 DATED: July 1, 2025  
26  
27  
28

**CERTIFICATE OF SERVICE**

I hereby certify that on June 30, 2025, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to all users.

/s/James M. Smith  
James M. Smith